

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

TAO AN, CHUNGANG GUAN,)	
CUI QINGYUN, HUIMIN LIN,)	
BEILE LI, YANMING WANG,)	
TAO ZHENG, ZHENG HU,)	
YUAN CAO, LINWAN FENG,)	
)	
Plaintiffs,)	Civil Action No. 1:22-CV-10062
)	
v.)	
)	
LUC A. DESPINS,)	
PAUL HASTINGS LLP,)	
)	
Defendants.)	

**NOTICE OF APPLICATION BY DEFENDANTS LUC A. DESPINS AND PAUL
HASTINGS LLP FOR REASONABLE ATTORNEYS' FEES AND COSTS AWARDED
AS RULE 11 SANCTIONS PURSUANT TO
THE COURT'S AUGUST 2, 2023 ORDER**

PLEASE TAKE NOTICE that upon the Declaration of Greg D. Andres and the exhibits annexed thereto, and the accompanying Memorandum of Law, Defendants Luc A. Despins and Paul Hastings LLP, by their attorneys Davis Polk & Wardwell LLP, will move this Court before the Honorable Valerie E. Caproni, District Judge for the United States District Court, Southern District of New York, at the United States Courthouse, Courtroom 443, 40 Foley Square, New York, New York, 10007, at a date and time as shall be set by the Court, as directed in the Court's August 2, 2023 Opinion and Order (Dkt. No. 29), for an Order calculating and awarding Defendants their reasonable attorneys' fees and costs, to be paid jointly and severally by Plaintiffs Tao An, Chungang Guan, Cui Qingyun, Huimin Lin, Beile Li, Yanming Wang, Tao Zheng, Zheng Hu, Yuan Cao, and Linwan Feng, and Plaintiffs' counsel, Richard Freeth and Yongbing Zhang.

New York, New York
Dated: August 11, 2023

Respectfully submitted,

/s/ Greg D. Andres

Greg D. Andres

Gina Cora

DAVIS POLK & WARDWELL LLP

450 Lexington Avenue

New York, New York 10017

(212) 450-4766

*Counsel for Defendants Luc A. Despins and
Paul Hastings LLP*